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May 17, 2017

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket Number 2017-9-E**
• **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing is Petitioner Adger Solar, LLC's Petition to Intervene, Cover Sheet and Certificate of Service.

We understand that an Order has recently come to light, that requires intervention within 30 days of the opening of an IRP Docket. That filing deadline has not previously been widely known and a final date for intervention has not normally been published in an IRP Docket. Petitioner does not believe that any party will be prejudiced by this Commission's acceptance of this Petition to Intervene, at this time. Petitioner will comply with the 30 day filing Rule, on all future IRP filings. This correspondence and the Petition to Intervene has been served on all parties of record. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/S/_____
Richard L. Whitt

RLW/cas

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2017-9-E**

IN RE: South Carolina Electric & Gas Company's)
Integrated Resource Plan (IRP))
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)
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)

**PETITION
TO
INTERVENE**

INTRODUCTION

A filing was made in Commission Docket 2017-9-E, on February 28, 2017, by South Carolina Electric & Gas Company, ("SCE&G"). Petitioner herein is Adger Solar, LLC. This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Petition to Intervene follows:

PETITIONER

Adger Solar, LLC.

1. Adger Solar, LLC is a utility-scale solar development firm based in Bluffton, South Carolina, ("Adger Solar"). Adger Solar has been active in South Carolina since 2014 and currently has over 500 MW of solar farms under development in South Carolina. The Adger Solar management team and its investors have led the development of over 9,000 MW of operating utility-scale wind and solar projects in the United States.
2. Adger Solar is a clean energy development company focused on creating lower-cost, utility-scale solar-electric generating facilities, with developments underway in six different South Carolina Counties. Adger Solar is a joint venture with one of the nation's oldest private energy investors, which has participated in the financing and development of more than 10,000 megawatts of wind and solar projects now in operation around the country.

3. Additionally, Adger Solar is in the process of developing a two hundred million dollar project in Clarendon County, South Carolina, consisting of two separate solar farm projects. Together, these two proposed projects in Clarendon County, South Carolina, will generate enough electricity to supply approximately 25,000 homes on an average annual basis.

Request for Intervenor Status.

4. Petitioner, Adger Solar previously received approval for intervention from this Commission in Commission Dockets 2016-8-E, and 2017-1-E.

5. Adger Solar is financially impacted by SCE&G's filing, as is outlined in more detail herein.

6. Specifically, Petitioner Adger Solar plans to conduct, business in SCE&G's assigned territory, including sales to SCE&G's Consumers and Petitioner has a material interest in SCE&G's filing.

SCE&G'S Filing.

7. SCE&G's filing was made pursuant to § 58-37-40, S.C. Code Ann., (1976, as amended) and Commission Order No. 1998-502. SCE&G's filing is SCE&G's annual update to its Integrated Resource Plan, ("IRP").

8. SCE&G's annual IRP filing outlines potential infrastructure which will be needed to match SCE&G's forecasted electricity requirements. SCE&G's IRP filing should contain a demand and energy forecast and the utility's acceptable plan for meeting SCE&G's forecast requirements.

9. As outlined hereinabove, Petitioner has substantial business interests in SCE&G's assigned territory in South Carolina.

10. Petitioner's position is that Petitioner has a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's review of SCE&G's filing in South Carolina and Petitioner's interest cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner will be impacted by SCE&G's IRP planning, which necessarily influences SCE&G's decision making, concerning demand-side and supply-side resources and those decisions impact the cost of electricity for South Carolina consumers. Therefore, the specifics of SCE&G's IRP are important to Petitioner from a financial standpoint. Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in SCE&G's filing, and this Commission's review and Petitioner's interest are not adequately represented by the current parties in this Docket.

11. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-96.

12. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] [is] allowed so that a full and complete record addressing...views and concerns can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

PETITION TO INTERVENE

14. The granting of Adger Solar, LLC's Petition to Intervene is (i) in the public interest (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed and (iii) contemplated in this Commission's Order 2012-96.

15. Adger Solar, LLC is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

Richard L. Whitt
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Columbia South Carolina, 29201
803-251-7442
Counsel for Adger Solar, LLC

May 17, 2017
Columbia, South Carolina

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2017-9-E**

IN RE: South Carolina Electric & Gas Company's)
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CERTIFICATE OF SERVICE

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Cover Sheet, Adger Solar, LLC's Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on May 17, 2017.

J. Blanding Holman, IV

Email: Bholman@selcsc.org

Jeffrey M. Nelson,

Email: jnelson@regstaff.sc.gov

Matthew W. Gissendanner,

Email: matthew.gissendanner@scana.com

/S/ _____
Carrie A. Schurg

May 17, 2017
Columbia, South Carolina